

EXHIBIT 2

Subject: Re: Wishart v. Welkley et al.

Date: Friday, April 9, 2021 at 3:49:18 PM Eastern Daylight Time

From: Joshua S. Moskovitz

To: Deutsch, Hillel

CC: rob

Hillel,

We're still awaiting this information in order to move ahead with e-discovery. When can we expect to receive it?

Joshua S. Moskovitz

The Law Office of Joshua Moskovitz, P.C.

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From: "Deutsch, Hillel" <Hillel.Deutsch@ag.ny.gov>

Date: Friday, March 26, 2021 at 6:17 PM

To: "Joshua S. Moskovitz" <josh@moskovitzlaw.com>

Cc: Rob Rickner <rob@ricknerpllc.com>

Subject: RE: Wishart v. Welkley et al.

Gentlemen,

Below is the list of phones in Defendants' possession from all Defendants except Swiatowy – I will provide his response as soon as it is received. I have also temporarily put Rice's new phone as "current phone" – I will follow up with the make/model when that arrives. I expect to get this information to you when I get back to the office on Tuesday.

Hillel

Custodian	Device/Account
Bright	Samsung Galaxy S3
Bright	LG V10
Bright	iPhone X
Bright	Apple iPhone 11pro
Bright	iPhone 4

Custodian	Device/Account
Maryanowski	Flip Phone - Verion LG
Maryanowski	iPhone 8

Custodian	Device/Account
Opperman	Samsung Galaxy S
Opperman	Samsung 8

Custodian	Device/Account
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Palistrant Samsung Galaxy S10

Custodian	Device/Account
Rice	Current phone
Rice	Motorola XT1565

Custodian	Device/Account
Soria	Galaxy S21
Soria	Galaxy Note 5

Custodian	Device/Account
Sullivan	Motorola Droid Turbo
Sullivan	Iphone 11

Custodian	Device/Account
Welkley	LG G7

Hillel Deutsch
NYS Assistant Attorney General
144 Exchange Blv. Rochester, NY 14614
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From: Joshua S. Moskowitz <josh@moskovitzlaw.com>
Sent: Wednesday, March 24, 2021 3:44 PM
To: Deutsch, Hillel <Hillel.Deutsch@ag.ny.gov>
Cc: Rob Rickner <rob@ricknerpllc.com>
Subject: Re: Wishart v. Welkley et al.

[EXTERNAL]

Hillel,

Attached is a letter we received today from 4Discovery, and the spreadsheet referenced in the letter, listing the ESI sources that need to be re-collected.

When can we expect to receive a list of all of your clients' phones so we can complete the task of ESI collection?

Joshua S. Moskowitz

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From: "Joshua S. Moskowitz" <josh@moskovitzlaw.com>
Date: Thursday, March 18, 2021 at 10:56 AM
To: "Deutsch, Hillel" <Hillel.Deutsch@ag.ny.gov>
Cc: Rob Rickner <rob@ricknerpllc.com>
Subject: Wishart v. Welkley et al.

Hillel,
Pursuant to the Court's order yesterday, we need a list of all of your clients' phones so we can complete the task of ESI collection.

In the meanwhile, we have asked 4Discovery to prepare a list of "the devices and accounts that have not been properly collected so that the chosen ESI vendor can complete ESI collection in a forensically sound manner." Order dated Jan. 29, 2021, p. 10.

Thank you,

Joshua S. Moskowitz

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